



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

URGENT MATTER – PROMPT REPLY NECESSARY
CERTIFIED MAIL – RETURN RECEIPT REQUESTED

DEC 14 2012

Jerry Richard, President
Purification Technologies, Inc.
67 Winthrop Street
Chester, CT 06412

Re: **NOTICE OF VIOLATION** of the applicable Generators Standards of Hazardous Waste, Section 3002 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6622(a) and 6924(d) through (m) and the Regulations of Connecticut State Agencies (RCSA):22a-449(c)-102 and 22a-449(c)-108.

Dear Mr. Richard:

On June 27, 2012, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Purification Technologies, Inc., EPA ID No. CTCESQG99999 with Connecticut Hazardous Waste Regulations RCSA 22a-449(c)-102 and 22a-449(c)-108 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of the Connecticut Hazardous Waste Regulations and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The specific violations are set forth below:

1. **Failure to adequately label containers of hazardous waste with the words "Hazardous Waste" and a description of the contents, such as the chemical name, as required by 40 CFR 262.32 and RCSA 22a-449(c)-102(a)**

Specifically, the following closed satellite accumulation (SAA) container, located outside the Main Laboratory was not labeled with a description of the contents, such as the chemical name, in accordance with RCSA 22a-449(c)-102(a):

One 5-gallon container, labeled, "hazardous waste, flammable liquid".
Emilio Cruz corrected the label at the time of the inspection.

2. **Failure to label or mark containers of universal waste batteries with any of the following phrases: "Universal Waste - Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)", as required by 40 CFR 273.5 and RCSA 22a-449(c)-113**

Specifically, the following container of universal batteries, located in the General Storage and Cylinder Maintenance Area, was not labeled with any of the following phrases: "Universal Waste - Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)", in accordance with RCSA 22a-449(c)-113:

One 5-gallon container with two nickel cadmium batteries, with no label and no date

3. **Failure to date universal waste lamps or containers of universal waste lamps, as required by 40 CFR 273.5 and RCSA 22a-449(c)-113**

Specifically, the following containers of universal waste lamps, located in the General Storage and Cylinder Maintenance Area, were not dated to demonstrate the length of time that the universal waste had been accumulated from the date it became a waste or was received, in accordance with RCSA 22a-449(c)-113:

One four-ft. cardboard box with three waste lamps, labeled, "used lamps" and with no date;
One three-ft. cardboard box, labeled, "used lamps" and with no date;

4. **Failure to date universal waste batteries or containers of universal waste batteries, as required by 40 CFR 273.5 and RCSA 22a-449(c)-113**

Specifically, the following container of universal wastes batteries was not dated to demonstrate the length of time that the universal waste had been accumulated from the date it became a waste or was received, in accordance with RCSA 22a-449(c)-113:

1 5-gallon container with two nickel cadmium batteries, with no label and no date;

You are hereby required to:

1. Immediately upon receipt of this NOTICE:
 - a. Label all satellite accumulation containers with the words "Hazardous Waste" and a description of the contents, such as the chemical name, as required by RCSA 22a-449(c)-102(a).

- b. Label all containers of universal waste batteries with any of the following phrases: "Universal Waste - Battery(ies)", "Waste Battery(ies)", "Used Battery(ies)", as required by RCSA 22a-449(c)-113.
- c. Date universal waste lamps or containers of universal waste lamps with the date it became a waste or was received to demonstrate the length of time that the universal waste has been accumulated, as required by RCSA 22a-449(c) -113.
- d. Date universal waste batteries or containers of universal waste batteries with the date it became a waste or was received to demonstrate the length of time that the universal waste has been accumulated, as required by RCSA 22a-449(c) -113.

2. Within (30) thirty calendar days of receipt of this **NOTICE**:

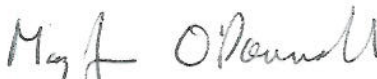
- a. Submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violations to:

Linda Brolin, Environmental Engineer
U.S. Environmental Protection Agency
5 Post Office Square, Suite 1100
Mail Code: OES05-1
Boston, MA 02109

Failure to correct the violation as required by this **NOTICE** may subject the facility to further federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA 42, U.S.C. § 6928.

If you have any questions regarding this **NOTICE**, please contact Linda Brolin, at (617) 918-1876.

Sincerely,


Mary Jane O'Donnell, Acting Manager
RCRA, EPCRA, and Federal Programs Unit

cc: Mohammed Deria, CT DEP

